10<sup>th</sup> August 2016 Our Ref: BPIM-037

TAN Books c/o Saint Benedict Press LLC PO Box 410487 Charlotte NC 28241, USA



## **CEASE AND DESIST DEMAND**

Pursuant to Title 17 of the United States Code

Dear Mr. Gallagher,

We are writing to notify you that your unlawful copying of *This Tremendous Lover* by Fr. Eugene Boylan ("*Work*") infringes upon our exclusive copyrights. Accordingly, you are hereby directed to

## CEASE AND DESIST ALL COPYRIGHT INFRINGEMENT.

Baronius Press is the owner of a copyright in various aspects of the *Work*, in particular:

I. Having the exclusive right to print, publish and sell the *Work* in book format and eBook format throughout the world granted on 16<sup>th</sup> March 2015 by the Mount St. Joseph Abbey of Roscrea, Co. Tipperary, Ireland.

Under United States copyright law, the copyrights have been in effect since 1994 when the copyright was restored under the Uruguay Round Agreements Act (URAA). All copyrightable aspects of the *Work* are copyrighted under United States copyright law.

It has come to our attention that you have been copying the *Work*. You have published and are selling the *Work* in book format under ISBN: 9780967597829 and as an eBook format (Amazon Kindle ASIN: B00FK9E0FW).

Your actions constitute copyright infringement in violation of United States copyright laws. Under 17 U.S.C. 504, the consequences of copyright infringement include statutory damages of between \$750 and \$30,000 per work, at the discretion of the court, and damages of up to \$150,000 per work for willful infringement. If you continue to engage in copyright infringement after receiving this letter, your actions will be evidence of "willful infringement."

We demand that you immediately (A) cease and desist your unlawful copying of the *Work* and (B) provide us with prompt written assurance within ten (10) days that you will cease and desist from further infringement of Baronius Press' copyrighted works.

If you do not comply with this cease and desist demand within this time period, Baronius Press is entitled to use your failure to comply as evidence of "willful infringement" and seek monetary damages and equitable relief for your copyright infringement. In the event you fail to meet this demand, please be advised that Baronius Press will contemplate pursuing all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees. Your liability and exposure under such legal action could be considerable.

We also request that you state the number of copies of the *Work* you have sold to date and the unjust enrichment (the sum of the total amount of sales) you have enjoyed from the sale of the infringing copies of the *Work*.

Yours Sincerely,

[-// <sub>2</sub>

Pavel Kejik Director